

**BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

**In the Matter of the Accusation)
Against:)**

YOUSSEF LALEZARIAN, M.D.)

File No. 11-2009-199747

**Physician's and Surgeon's)
Certificate No. A-38247)**

Respondent)

DECISION

The attached Stipulated Settlement and Disciplinary Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on September 16, 2010.

IT IS SO ORDERED August 17, 2010.

MEDICAL BOARD OF CALIFORNIA

**By: *Shelton Duruisseau*
SHELTON DURUISSEAU, Ph.D.
Chair, Panel A**

1 EDMUND G. BROWN JR.
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2 PAUL C. AMENT
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3 CHRIS LEONG
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7 *Attorneys for Complainant*

8 **BEFORE THE**
MEDICAL BOARD OF CALIFORNIA
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:
12 **YOUSSEF LALEZARIAN, M.D.**
13 **165 S. Layton Drive**
Los Angeles, CA 90049
14 **Physician's and Surgeon's Certificate No.**
A 38247

15 Respondent.

Case No. 11-2009-199747

OAH No. 2010010871

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

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18 In the interest of a prompt and speedy settlement of this matter, consistent with the public
19 interest and the responsibility of the Medical Board of California (Board), the parties hereby
20 agree to the following Stipulated Settlement and Disciplinary Order which will be submitted to
21 the Board for approval and adoption as the final disposition of the Accusation.

22 PARTIES

23 1. Linda K. Whitney (Complainant) is the Executive Director of the Board. The former
24 Executive Director brought this action solely in her official capacity and is represented in this
25 matter by Edmund G. Brown Jr., Attorney General of the State of California, by Chris Leong,
26 Deputy Attorney General.
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2. Respondent Youssef Lalezarian, M.D. (Respondent) is represented in this proceeding by attorney Tracy Green, Esq., whose address is 801 S. Figueroa Street, Suite 1200 Los Angeles, CA 90017.

3. On or about April 12, 1982, the Board issued Physician's and Surgeon's Certificate No. A 38247 to Respondent. The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 11-2009-199747 and will expire on July 31, 2011, unless renewed.

JURISDICTION

4. Accusation No. 11-2009-199747 was filed before the Board and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on December 21, 2009. Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 11-2009-199747 is attached as Exhibit A and is incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 11-2009-199747. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at his own expense; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

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1 CULPABILITY

2 8. Respondent does not contest that, at an administrative hearing, complainant could
3 establish a prima facie case with respect to the charges and allegations contained in Accusation
4 No. 11-2009-199747 and that he has thereby subjected his license to disciplinary action.

5 9. Respondent agrees that if he ever petitions for early termination or modification of
6 probation, or if the Board ever petitions for revocation of probation, all of the charges and
7 allegations contained in Accusation No. 11-2009-199747 shall be deemed true, correct and fully
8 admitted by respondent for purposes of that proceeding or any other licensing proceeding
9 involving respondent in the State of California.

10 10. Respondent agrees that his Physician's and Surgeon's Certificate is subject to
11 discipline and he agrees to be bound by the Board's imposition of discipline as set forth in the
12 Disciplinary Order below.

13 CONTINGENCY

14 11. This stipulation shall be subject to approval by the Medical Board of California.
15 Respondent understands and agrees that counsel for Complainant and the staff of the Medical
16 Board of California may communicate directly with the Board regarding this stipulation and
17 settlement, without notice to or participation by Respondent or his counsel. By signing the
18 stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek
19 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
20 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
21 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
22 action between the parties, and the Board shall not be disqualified from further action by having
23 considered this matter.

24 12. The parties understand and agree that facsimile copies of this Stipulated Settlement
25 and Disciplinary Order, including facsimile signatures thereto, shall have the same force and
26 effect as the originals.
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1 13. In consideration of the foregoing admissions and stipulations, the parties agree that
2 the Board may, without further notice or formal proceeding, issue and enter the following
3 Disciplinary Order:

4 **DISCIPLINARY ORDER**

5 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 38247 issued
6 to Respondent Youssef Lalezarian, M.D. is revoked. However, the revocation is stayed and
7 Respondent is placed on probation for thirty-five months on the following terms and conditions.

8 1. ETHICS COURSE Within 60 calendar days of the effective date of this Decision,
9 respondent shall enroll in a course in ethics, at respondent's expense, approved in advance by the
10 Board or its designee. Failure to successfully complete the course during the first year of
11 probation is a violation of probation.

12 An ethics course taken after the acts that gave rise to the charges in the Accusation, but
13 prior to the effective date of the Decision may, in the sole discretion of the Board or its designee,
14 be accepted towards the fulfillment of this condition if the course would have been approved by
15 the Board or its designee had the course been taken after the effective date of this Decision.

16 Respondent shall submit a certification of successful completion to the Board or its
17 designee not later than 15 calendar days after successfully completing the course, or not later than
18 15 calendar days after the effective date of the Decision, whichever is later.

19 2. MEDICAL EVALUATION AND TREATMENT Within 30 calendar days of the
20 effective date of this Decision, and on a periodic basis thereafter as may be required by the Board
21 or its designee, respondent shall undergo a medical evaluation by a Board-appointed physician
22 who shall consider any information provided by the Board or designee, and any other information
23 the evaluating physician deems relevant, and shall furnish a medical report to the Board or its
24 designee.

25 Following the evaluation, respondent shall comply with all restrictions or conditions
26 recommended by the evaluating physician within 15 calendar days after being notified by the
27 Board or its designee.

28 If respondent is required by the Board or its designee to undergo medical treatment,

1 respondent shall, within 30 calendar days of the requirement notice, submit to the Board or its
2 designee for prior approval the name and qualifications of a treating physician of respondent's
3 choice. Upon approval of the treating physician, respondent shall within 15 calendar days
4 undertake medical treatment and shall continue such treatment until further notice from the Board
5 or its designee.

6 The treating physician shall consider any information provided by the Board or its designee
7 or any other information the treating physician may deem pertinent prior to commencement of
8 treatment. Respondent shall have the treating physician submit quarterly reports to the Board or
9 its designee indicating whether or not the respondent is capable of practicing medicine safely.
10 Respondent shall provide the Board or its designee with any and all medical records pertaining to
11 treatment that the Board or its designee deems necessary.

12 If, prior to the completion of probation, respondent is found to be physically incapable of
13 resuming the practice of medicine without restrictions, the Board shall retain continuing
14 jurisdiction over respondent's license, and the period of probation shall be extended until the
15 Board determines that respondent is physically capable of resuming the practice of medicine
16 without restrictions. Respondent shall pay the cost of the medical evaluation(s) and treatment.

17 Failure to undergo and continue medical treatment or comply with the required additional
18 conditions or restrictions is a violation of probation.

19 Respondent shall not engage in the practice of medicine until notified in writing by the
20 Board or its designee of its determination that respondent is medically fit to practice safely.

21 3. NOTIFICATION Prior to engaging in the practice of medicine, the respondent shall
22 provide a true copy of the Decision and Accusation to the Chief of Staff or the Chief Executive
23 Officer at every hospital where privileges or membership are extended to respondent, at any other
24 facility where respondent engages in the practice of medicine, including all physician and locum
25 tenens registries or other similar agencies, and to the Chief Executive Officer at every insurance
26 carrier which extends malpractice insurance coverage to respondent. Respondent shall submit
27 proof of compliance to the Board or its designee within 15 calendar days.

28 This condition shall apply to any change(s) in hospitals, other facilities or insurance carrier.

1 4. SUPERVISION OF PHYSICIAN ASSISTANTS During probation, respondent is
2 prohibited from supervising physician assistants.

3 5. OBEY ALL LAWS Respondent shall obey all federal, state and local laws, all rules
4 governing the practice of medicine in California, and remain in full compliance with any court
5 ordered criminal probation, payments and other orders.

6 6. QUARTERLY DECLARATIONS Respondent shall submit quarterly declarations
7 under penalty of perjury on forms provided by the Board, stating whether there has been
8 compliance with all the conditions of probation. Respondent shall submit quarterly declarations
9 not later than 10 calendar days after the end of the preceding quarter.

10 7. PROBATION UNIT COMPLIANCE Respondent shall comply with the Board's
11 probation unit. Respondent shall, at all times, keep the Board informed of respondent's business
12 and residence addresses. Changes of such addresses shall be immediately communicated in
13 writing to the Board or its designee. Under no circumstances shall a post office box serve as an
14 address of record, except as allowed by Business and Professions Code section 2021(b).

15 Respondent shall not engage in the practice of medicine in respondent's place of residence.
16 Respondent shall maintain a current and renewed California physician's and surgeon's license.

17 Respondent shall immediately inform the Board, or its designee, in writing, of travel to any
18 areas outside the jurisdiction of California which lasts, or is contemplated to last, more than 30
19 calendar days.

20 8. INTERVIEW WITH THE BOARD, OR ITS DESIGNEE Respondent shall be
21 available in person for interviews either at respondent's place of business or at the probation unit
22 office, with the Board or its designee, upon request at various intervals, and either with or without
23 prior notice throughout the term of probation.

24 9. RESIDING OR PRACTICING OUT-OF-STATE In the event respondent should
25 leave the State of California to reside or to practice, respondent shall notify the Board or its
26 designee in writing 30 calendar days prior to the dates of departure and return. Non-practice is
27 defined as any period of time exceeding 30 calendar days in which respondent is not engaging in
28 any activities defined in Sections 2051 and 2052 of the Business and Professions Code.

1 All time spent in an intensive training program outside the State of California which has
2 been approved by the Board or its designee shall be considered as time spent in the practice of
3 medicine within the State. A Board-ordered suspension of practice shall not be considered as a
4 period of non-practice. Periods of temporary or permanent residence or practice outside
5 California will not apply to the reduction of the probationary term. Periods of temporary or
6 permanent residence or practice outside California will relieve respondent of the responsibility to
7 comply with the probationary terms and conditions with the exception of this condition and the
8 following terms and conditions of probation: Obey All Laws and Probation Unit Compliance.

9 Respondent's license shall be automatically cancelled if respondent's periods of temporary
10 or permanent residence or practice outside California total two years. However, respondent's
11 license shall not be cancelled as long as respondent is residing and practicing medicine in another
12 state of the United States and is on active probation with the medical licensing authority of that
13 state, in which case the two year period shall begin on the date probation is completed or
14 terminated in that state.

15 10. FAILURE TO PRACTICE MEDICINE - CALIFORNIA RESIDENT

16 In the event respondent resides in the State of California and for any reason respondent
17 stops practicing medicine in California, respondent shall notify the Board or its designee in
18 writing within 30 calendar days prior to the dates of non-practice and return to practice. Any
19 period of non-practice within California, as defined in this condition, will not apply to the
20 reduction of the probationary term and does not relieve respondent of the responsibility to comply
21 with the terms and conditions of probation. Non-practice is defined as any period of time
22 exceeding 30 calendar days in which respondent is not engaging in any activities defined in
23 sections 2051 and 2052 of the Business and Professions Code.

24 All time spent in an intensive training program which has been approved by the Board or its
25 designee shall be considered time spent in the practice of medicine. For purposes of this
26 condition, non-practice due to a Board-ordered suspension or in compliance with any other
27 condition of probation, shall not be considered a period of non-practice.

28 Respondent's license shall be automatically cancelled if respondent resides in California

1 and for a total of two years, fails to engage in California in any of the activities described in
2 Business and Professions Code sections 2051 and 2052.

3 11. COMPLETION OF PROBATION Respondent shall comply with all financial
4 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the
5 completion of probation. Upon successful completion of probation, respondent's certificate shall
6 be fully restored.

7 12. VIOLATION OF PROBATION Failure to fully comply with any term or condition
8 of probation is a violation of probation. If respondent violates probation in any respect, the
9 Board, after giving respondent notice and the opportunity to be heard, may revoke probation and
10 carry out the disciplinary order that was stayed. If an Accusation, Petition to Revoke Probation,
11 or an Interim Suspension Order is filed against respondent during probation, the Board shall have
12 continuing jurisdiction until the matter is final, and the period of probation shall be extended until
13 the matter is final.

14 13. LICENSE SURRENDER Following the effective date of this Decision, if
15 respondent ceases practicing due to retirement, health reasons or is otherwise unable to satisfy the
16 terms and conditions of probation, respondent may request the voluntary surrender of
17 respondent's license. The Board reserves the right to evaluate respondent's request and to
18 exercise its discretion whether or not to grant the request, or to take any other action deemed
19 appropriate and reasonable under the circumstances. Upon formal acceptance of the surrender,
20 respondent shall within 15 calendar days deliver respondent's wallet and wall certificate to the
21 Board or its designee and respondent shall no longer practice medicine. Respondent will no
22 longer be subject to the terms and conditions of probation and the surrender of respondent's
23 license shall be deemed disciplinary action. If respondent re-applies for a medical license, the
24 application shall be treated as a petition for reinstatement of a revoked certificate.

25 14. PROBATION MONITORING COSTS Respondent shall pay the costs associated
26 with probation monitoring each and every year of probation, as designated by the Board, but may
27 be adjusted on an annual basis. Such costs shall be payable to the Medical Board of California
28 and delivered to the Board or its designee no later than January 31 of each calendar year. Failure


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1 to pay costs within 30 calendar days of the due date is a violation of probation.

2 ACCEPTANCE

3 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
4 discussed it with my attorney, Tracy Green. I understand the stipulation and the effect it will
5 have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and
6 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
7 Decision and Order of the Board.

8
9 DATED: 6/18/10


YOUSSEF LALEZARIAN, M.D.
Respondent

11 I have read and fully discussed with Respondent Youssef Lalezarian, M.D. the terms and
12 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
13 I approve its form and content.

14 DATED: _____

Tracy Green
Attorney for Respondent

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1 to pay costs within 30 calendar days of the due date is a violation of probation.

2 ACCEPTANCE

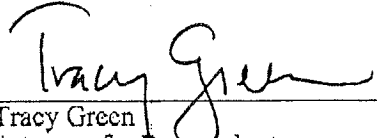
3 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
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5 have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and
6 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
7 Decision and Order of the Board.

8
9 DATED: _____

10 YOUSSEF LALEZARIAN, M.D.
Respondent

11 I have read and fully discussed with Respondent Youssef Lalezarian, M.D. the terms and
12 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
13 I approve its form and content.

14 DATED: 6-19-10

15 
Tracy Green
Attorney for Respondent

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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Medical Board of California of the Department of Consumer Affairs.

Dated: 6/22/10

Respectfully Submitted,

EDMUND G. BROWN JR.
Attorney General of California
PAUL C. AMENT
Supervising Deputy Attorney General



CHRIS LEONG
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 11-2009-199747

1 EDMUND G. BROWN JR.
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2 PAUL C. AMENT
Supervising Deputy Attorney General
3 CHRIS LEONG
Deputy Attorney General
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7 *Attorneys for Complainant*

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO December 21, 2009
BY [Signature]

8 **BEFORE THE**
9 **MEDICAL BOARD OF CALIFORNIA**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 11-2009-199747

12 **YOUSSEF LALEZARIAN, M.D.**
13 **165 S. Layton Drive**
Los Angeles, CA 90049
14 **Physician's and Surgeon's Certificate No.**
A 38247

A C C U S A T I O N

15 Respondent.

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17
18 Complainant alleges:

19 **PARTIES**

20 1. Barbara Johnston (Complainant) brings this Accusation solely in her official capacity
21 as the Executive Director of the Medical Board of California (Board).

22 2. On or about April 12, 1982, the Board issued Physician's and Surgeon's Certificate
23 Number A 38247 to Youssef Lalezarian, M.D. (Respondent). This certificate was in full force
24 and effect at all times relevant to the charges brought herein and will expire on July 31, 2011,
25 unless renewed.
26
27
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JURISDICTION

3. This Accusation is brought before the Board under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 490 of the Code states:

“A board may suspend or revoke a license on the ground that the licensee has been convicted of a crime, if the crime is substantially related to the qualifications, functions, or duties of the business or profession for which the license was issued. A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere. Any action which a board is permitted to take following the establishment of a conviction may be taken when the time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when an order granting probation is made suspending the imposition of sentence, irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code.”

5. Section 2227 of the Code states:

“...a licensee who is found guilty under the Medical Practice Act may have his or her license revoked, suspended for a period not to exceed one year, placed on probation and required to pay the costs of probation monitoring, or such other action taken in relation to discipline as the Division¹ deems proper.”

6. Section 2234 of the Code states:

"The Division of Medical Quality shall take action against any licensee who is charged with unprofessional conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not limited to, the following:

¹ California Business and Professions Code section 2002, as amended and effective January 1, 2008, provides that, unless otherwise expressly provided, the term “board” as used in the State Medical Practice Act (Cal. Bus. & Prof. Code, §§ 2000, et seq.) means the “Medical Board of California,” and references to the “Division of Medical Quality” and “Division of Licensing” in the Act or any other provision of law shall be deemed to refer to the Board.

1 "(a) Violating or attempting to violate, directly or indirectly, assisting in or abetting
2 the violation of, or conspiring to violate any provision of this chapter [Chapter 5, the
3 Medical Practice Act].

4 "(b) Gross negligence.

5 "(c) Repeated negligent acts. To be repeated, there must be two or more negligent
6 acts or omissions. An initial negligent act or omission followed by a separate and distinct
7 departure from the applicable standard of care shall constitute repeated negligent acts.

8 "(1) An initial negligent diagnosis followed by an act or omission medically
9 appropriate for that negligent diagnosis of the patient shall constitute a single negligent act.

10 "(2) When the standard of care requires a change in the diagnosis, act, or omission
11 that constitutes the negligent act described in paragraph (1), including, but not limited to, a
12 reevaluation of the diagnosis or a change in treatment, and the licensee's conduct departs
13 from the applicable standard of care, each departure constitutes a separate and distinct
14 breach of the standard of care.

15 "(d) Incompetence.

16 "(e) The commission of any act involving dishonesty or corruption which is
17 substantially related to the qualifications, functions, or duties of a physician and surgeon.

18 "(f) Any action or conduct which would have warranted the denial of a certificate."

19 7. Section 2236 of the Code states:

20 "(a) The conviction of any offense substantially related to the qualifications,
21 functions, or duties of a physician and surgeon constitutes unprofessional conduct within
22 the meaning of this chapter [Chapter 5, the Medical Practice Act]. The record of conviction
23 shall be conclusive evidence only of the fact that the conviction occurred.

24 "...

25 "(d) A plea or verdict of guilty or a conviction after a plea of nolo contendere is
26 deemed to be a conviction within the meaning of this section and Section 2236.1. The
27 record of conviction shall be conclusive evidence of the fact that the conviction occurred."

28 8. California Code of Regulations, title 16, section 1360, states:

“For the purposes of denial, suspension or revocation of a license, certificate or permit pursuant to Division 1.5 (commencing with Section 475) of the code, a crime or act shall be considered to be substantially related to the qualifications, functions or duties of a person holding a license, certificate or permit under the Medical Practice Act if to a substantial degree it evidences present or potential unfitness of a person holding a license, certificate or permit to perform the functions authorized by the license, certificate or permit in a manner consistent with the public health, safety or welfare. Such crimes or acts shall include but not be limited to the following: Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of, or conspiring to violate any provision of the Medical Practice Act.”

FIRST CAUSE FOR DISCIPLINE

(Conviction of a Crime)

9. Respondent is subject to disciplinary action under Code sections 490, 2234 and 2236, subdivision (a) in that on or about August 7, 2008, he was convicted of a crime that is substantially related to the qualifications, functions, or duties of a physician and surgeon. The circumstances are as follows:

10. On or about September 18, 2007, in the case entitled *The People of the State of California v. Youssef Lalezarian*, Superior Court of California, County of Los Angeles, Case No. BA327174, a Felony Complaint for Arrest Warrant was filed against Respondent. The complaint charged one count of paying unlawful rebates (Code § 650, subd. (a)). This felony Complaint will hereinafter be referred to as “the Complaint.”

11. Specifically, Count 1 of the Complaint alleged:

“During the time period beginning on December 24, 2004 through March 30, 2006, in the County of Los Angeles, State of California, defendant YOUSSEF LALEZARIAN, did while licensed under Division 2 of the California Business and Professions Code, unlawfully offer and deliver, a rebate, commission, preference, patronage, dividend, discount and other consideration as compensation and inducement for referring patients,

1 clients and customers to Jairo Gonzalez in violation of Business and Professions Code
2 section 650(a), a felony.”

3 12. On or about August 7, 2008, Respondent pled nolo contendere to Count 1 of the
4 Complaint, which was reduced to a misdemeanor. The Court accepted the plea. The Court
5 placed Respondent on summary probation for 20 months and ordered him to pay a fine and
6 assessments totaling approximately \$6,220. Respondent’s conviction was based on his conduct
7 of paying approximately \$13,060 of unlawful rebates.

8 13. Respondent’s nolo contendere plea on August 7, 2008, to one misdemeanor count of
9 paying unlawful rebates as alleged in the Complaint, and the Court’s acceptance of the plea,
10 constituted a conviction of a crime that is substantially related to the qualifications, functions, or
11 duties of a physician and surgeon, within the meaning of section 490 and 2236 of the Code.

12 PRAYER

13 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
14 and that following the hearing, the Medical Board of California issue a decision:

15 1. Revoking or suspending Physician’s and Surgeon’s Certificate Number A 38247,
16 issued to Youssef Lalezarian, M.D..

17 2. Revoking, suspending or denying approval of Youssef Lalezarian, M.D.’s authority to
18 supervise physician assistants, pursuant to section 3527 of the Code;

19 3 Ordering Youssef Lalezarian, M.D. to pay the Medical Board of California the
20 reasonable costs, if placed on probation, for probation monitoring;

21 4 Taking such other and further action as deemed necessary and proper.

22
23 DATED: December 21, 2009


24 BARBARA JOHNSTON
25 Executive Director
26 Medical Board of California
27 Department of Consumer Affairs
28 State of California
Complainant